

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**CARMEN AUTO SALES III, INC.,**  
a Michigan corporation,

Case No. 16-12980  
Hon. Laurie J. Michaelson  
David R. Grand

Plaintiff,

v

**CITY OF DETROIT**, a Michigan municipal  
corporation, **GENE'S TOWING**, a Michigan corporation,  
**B & G TOWING**, a Michigan corporation, **JONATHON  
D. PARNELL**, a sergeant in the Detroit Police Department,  
and **JEFF BOU**, an individual working for the City of Detroit,

Defendants.

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**KASED LAW PLLC**

By: Ziyad Kased (P72237)

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Attorneys for Plaintiff

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Troy, MI 48083

(248) 680-7300

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**CITY OF DETROIT LAW DEPARTMENT**

By: Eric B. Gaabo (P39213)

[Gaabe@detroitmi.gov](mailto:Gaabe@detroitmi.gov)

Attorneys for Defendants City of Detroit,

Jonathan Parnell & Jeff Bou

Coleman A. Young Municipal Center

2 Woodward Avenue, 5<sup>th</sup> Floor

Detroit, MI 48226

(313) 237-3052

By: Nicholas J. Bachand (P67447)

[attorneybachand@gmail.com](mailto:attorneybachand@gmail.com)

Attorney for Defendants B&G Towing, LLC,

And Gene's Towing, Inc.

2411 Vinewood

Detroit, MI 48216

(313) 228-0860

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**DEFENDANT GENE'S TOWING, INC. WITNESS LIST**

NOW COMES Defendant, GENE'S TOWING, INC., by and through its attorney,

NICHOLAS J. BACHAND, and submits the following for its Witness List:

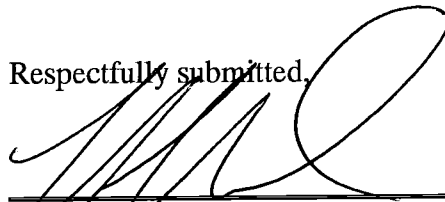
1. Current and former employees of Carmen Auto Sales III, Inc  
45 E 8 Mile Road  
Hazel Park, MI 48030
2. Nicholas Leo Carmisino  
45 E 8 Mile Road  
Hazel Park, MI 48030
3. Anthony Joseph Carmisino  
45 E 8 Mile Road  
Hazel Park, MI 48030
4. Jonathon D. Parnell  
c/o Detroit Police Department  
1301 Third St.  
Detroit, MI 48226
5. Jeff Bou  
c/o City of Detroit  
Coleman A. Young Municipal Center  
Two Woodward  
Detroit, MI 48226
6. Current and former employees of the Detroit Police Department  
Auction Detail Department  
2121 West Fort Street  
Detroit, MI 48216
7. Anthony Thomas  
8100 Lynch  
Detroit, MI 48234
8. Current and former employees of B&G Towing, LLC  
8100 Lynch  
Detroit, MI 48234
9. Paul Ott  
7770 Dix  
Detroit, MI 48209
10. Current and former employees of Gene's Towing, Inc.  
7770 Dix  
Detroit, MI 48209

11. Current and former employees of Boulevard & Trumbull Towing, Inc.  
2411 Vinewood  
Detroit, MI 48216
12. Accountants, Bookkeepers and Tax Return Preparers for Carmens Auto Sales III, Inc.
13. Employees, Officers, Representatives or Agents of First United Enterprises Corporation.
14. Djamel Tiguert
15. Frank Nash Carmisino  
45 E 8 Mile Road  
Hazel Park, MI 48030
16. Maurice Cox  
City of Detroit Planning and Development Department  
Coleman A. Young Municipal Center  
2 Woodward Ave., Suite 412  
Detroit, MI 48226
17. Jill Bryant  
Detroit Building Authority  
1301 Third Avenue  
Detroit, MI 48226
18. Felicia Studstill  
Detroit Alliance  
c/o Detroit Building Authority  
1301 Third Avenue  
Detroit, MI 48226
19. Gwendolyn Stokes  
City of Detroit Police Department  
1301 Third Avenue  
Detroit, MI 48226
20. David Mischiu  
c/o Signature Associates
21. Jerome Eagger  
Summit Commercial LLC  
7700 Second Avenue, Suite 300  
Detroit, MI 48202
22. Rolland Wilkins  
City of Detroit

Coleman A. Young Municipal Center  
2 Woodward Avenue  
Detroit, MI 48226

23. Bruce Goldman  
City of Detroit Law Department  
Coleman A. Young Municipal Center  
2 Woodward Avenue, Suite 500  
Detroit, MI 48226
24. Current and former employees of the Detroit Police Department
25. Keeper of the records City of Detroit Police Department
26. Keeper of the records City of Detroit Building and Safety Engineers
27. All Necessary rebuttal witnesses.
28. All necessary impeachment witnesses.
29. All witnesses names as a result of discovery including interrogatories, depositions, requests for documents, and request for admissions.
30. Any and all witnesses listed by and on Plaintiff's and Co-Defendants witness list.
31. Defendant reserves the right to amend its Witness List up until the time of Trial as witnesses become known.

Respectfully submitted,



NICHOLAS J. BACHAND (P67447)  
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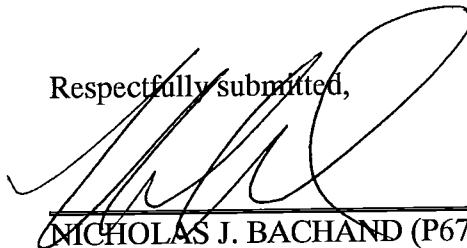
Dated: January 17, 2017

**CERTIFICATE OF SERVICE**

I hereby certify that on January 17, 2017 I served this Witness List of Defendant Gene's Towing, Inc. and this Certificate of Service, on all counsel listed on this pleading via email at the addresses listed for them.

I declare that the above statement is true to the best of my information, knowledge and belief.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'N. Bachand', is written over a horizontal line.

NICHOLAS J. BACHAND (P67447)

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Detroit, MI 48216  
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[attorneybachand@gmail.com](mailto:attorneybachand@gmail.com)